

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**UNITED STATES OF AMERICA** : **Criminal No. 03-\_\_\_\_\_**

**v.** : **Date Filed: October \_\_\_, 2003**

**ALLEN GADDY** : **Violations:**  
**a/k/a "Douglas Gaddy"**

: **21 U.S.C. § 841(a)(1) (Possession with**  
: **intent to distribute more than 5 grams of**  
: **cocaine base ("crack") - one count)**  
: **21 U.S.C. § 860(a) (Possession with intent**  
: **to distribute more than 5 grams of**  
: **cocaine base ("crack") within 1000 feet of a**  
: **school - one count)**  
: **18 U.S.C. § 924(c) (Possession of a firearm**  
: **in furtherance of a drug trafficking**  
: **crime - one count)**  
: **18 U.S.C. § 922(g)(1) (Possession of a**  
: **firearm by a convicted felon - one count)**  
: **Notice of Forfeiture**

**INDICTMENT**

**COUNT ONE**

THE GRAND JURY CHARGES THAT:

On or about May 12, 2003, in the Eastern District of Pennsylvania, defendant

**ALLEN GADDY,**  
**a/k/a "Douglas Gaddy,"**

knowingly and intentionally possessed with intent to distribute in excess of 5 grams, that is, approximately 25 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 12, 2003, in the Eastern District of Pennsylvania, defendant

**ALLEN GADDY,  
a/k/a “Douglas Gaddy,”**

knowingly and intentionally possessed with intent to distribute in excess of 5 grams, that is, approximately 25 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1000 feet of the real property comprising the John F. Hartranft School, a public elementary school, located at 720 W. Cumberland Street, Philadelphia, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

In violation of Title 21, United States Code, Section 860(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 12, 2003, in the Eastern District of Pennsylvania, defendant

**ALLEN GADDY,  
a/k/a “Douglas Gaddy,”**

knowingly possessed a firearm, that is, a Hi Point 9 mm semi-automatic handgun, serial number 836372, loaded with seven live rounds of ammunition, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine base (“crack”), in violation of Title 21, United States Code, Section 841(a)(1), and possession with intent to distribute cocaine base (“crack”) within 1000 feet of an elementary school, in violation of Title 21 United States Code, Section 860(a), as charged in Counts One and Two of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 12, 2003, in Philadelphia, in the Eastern District of  
Pennsylvania, defendant

**ALLEN GADDY,  
a/k/a “Douglas Gaddy,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce, a firearm, that is, a Hi Point 9 mm semi-automatic handgun, serial number 836372, loaded with seven live rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

As a result of the violation of Title 18, United States Code, Sections 924(c) and 922(g)(1), as set forth in Counts Three and Four of this Indictment, defendant

**ALLEN GADDY,  
a/k/a “Douglas Gaddy,”**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), the firearm and ammunition involved in the commission of this offense, including, but not limited to:

- (a) a Hi Point 9 mm semi-automatic handgun, serial number 836372, loaded with seven live rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A True Bill:

\_\_\_\_\_  
GRAND JURY FOREPERSON

\_\_\_\_\_  
PATRICK L. MEEHAN  
UNITED STATES ATTORNEY